

EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(NORTHERN DIVISION)**

DAVID J. BOSHEA,

Plaintiff,

v.

COMPASS MARKETING, INC.

Defendant.

Case No. 1:21-CV-00309-ELH

DECLARATION OF JAMES C. DIPAULA

I, James C. DiPaula, hereby declare and affirm as follows:

1. I am over 18 years of age and am competent to make this Declaration.
2. I was employed by Compass Marketing Inc. from 2010 until 2014.
3. In 2014, I voluntarily resigned from Compass Marketing Inc. to pursue other opportunities.
4. While at the time of my resignation I held the title Executive Vice President at Compass Marketing, Inc., my responsibilities were primarily limited to business development, client relationships and strategic initiatives. Mr. Boshea was employed by Compass before and after my tenure and did not report to me.
5. I was not involved in hiring Mr. Boshea in 2007. I did not prepare, review or see his employment contract. I learned of his employment after he had been hired, and I understood that he was a longtime friend of Compass Marketing Inc.'s CEO John White.
6. I was not involved in the negotiation of Mr. Boshea's employment agreement.
7. I was not the supervisor for Mr. Boshea at any time between 2007 and 2014. He lived in Illinois, and I in the Annapolis, Maryland area.

8. Because I resigned from Compass Marketing in 2014, I was not involved in the decision to terminate Mr. Boshea in 2020.

9. I have no personal knowledge relating to Mr. Boshea's employment, salary or severance payment claims.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE.

Date:

August 25, 2021

James C. DiPaula